

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**STACIE RAY, BASIL ARGENTO,  
JANE DOE, and ASHLEY BREDA,**

Plaintiffs,

v.

**LANCE HIMES, in his official capacity  
as Director of the Ohio Department  
of Health, KAREN SORRELL, in her  
official capacity as Chief of the Office of  
Vital Statistics and JUDITH NAGY, in her  
official capacity as State Registrar of the  
Office of Vital Statistics,**

Case No.:

Defendants.

**MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to S.D. Ohio Civ. R. 83.3(e) and 83.4(a), Freda Levenson, trial attorney for Plaintiffs Stacie Ray, Basil Argento, Jane Doe, and Ashley Breda, in the above-referenced action, hereby moves the court to admit Gabriel Arkles *pro hac vice* to appear and participate as co-counsel in this case for Plaintiffs.

Movant represents that Gabriel Arkles is a member in good standing of the highest court of the State of New York as attested by the accompanying certificate from that court, and that he is not eligible to become a member of the permanent bar of this Court. This Motion is accompanied by the required \$200.00 fee.

Gabriel Arkles understands that, unless expressly excused, he must register for electronic filing with this Court promptly upon the granting of this Motion.

Gabriel Arkles's relevant identifying information is as follows:

Business telephone: (212) 549-2659

Business fax: (212) 549-2650

Business address:

American Civil Liberties Union

125 Broad Street, 18<sup>th</sup> Floor

New York, NY 10004

Business e-mail address: garkles@aclu.org

By: /s/ Freda Levenson  
Freda Levenson, Trial Attorney  
(0045916)  
ACLU of Ohio  
4506 Chester Ave.  
Cleveland, OH 44103  
Phone: (216) 472-2220  
Facsimile: (216) 472-2210  
Email: flevenson@acluohio.org

*Attorney for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of March, 2018, I filed the foregoing electronically through the Court's CM/ECF system. Parties may access this filing through the Court's system. Because counsel for defendants has not yet appeared, I further certify that I will personally serve the foregoing on all defendants along with the complaint and request for waiver of service, at the following addresses:

Lance Himes  
Office of the Director  
Ohio Department of Health  
246 North High Street  
Columbus, OH 43215  
lance.himes@odh.ohio.gov

Karen Sorrell  
Chief  
Office of Vital Statistics  
225 Neilston Street  
Columbus, OH 43215  
Karen.sorrell@odh.ohio.gov

Judith Nagy  
State Registrar  
Office of Vital Statistics  
225 Neilston Street  
Columbus, OH 43215  
Judith.nagy@odh.ohio.gov

/s/ Freda J. Levenson

Freda Levenson  
Attorney for Plaintiffs